

REMARKS

Claims 1-22 are currently pending in the subject application and are presently under consideration as shown on pp. 2-4 of the reply. Claim 11 has been amended to correct minor informalities.

Additionally, applicant's representative notes with appreciation the indication that claims 6-8 and 15 would be allowable if recast in independent form to include all limitations of respective base claim(s) and any intervening claim(s). It is believed such amendments are not necessary in view of the below-noted deficiencies of the cited references *vis a vis* the claimed invention. However, if necessary, applicant's representative reserves the option to amend such claims at a later date. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Objection to Title

Examiner objects to the title of the invention, "SELF CONTAINED KEYPAD ASSEMBLY," as insufficiently descriptive of the invention. Please replace the previous title with "SELF CONTAINED KEYPAD ASSEMBLY WITH IDENTIFICATION TAG FOR AUTOMATIC IDENTIFICATION." Accordingly, withdrawal of the objection is respectfully requested.

II. Rejection of Claims 1-5, 10-14, 15-18 and 20-22 Under 35 U.S.C. §102(e)

Claims 1-5, 10-14, 15-18 and 20-22 stand rejected under 35 U.S.C. §102(e) as being anticipated by Kela *et al.* (US 6,950,680). This rejection should be withdrawn for at least the following reasons. Kela *et al.* does not teach or suggest each and every aspect of the subject claims.

For a prior art reference to anticipate, 35 U.S.C. §102 requires that "***each and every element*** as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (*quoting Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)) (emphasis added).

Applicants' claimed invention relates to systems and methods of supplying a self contained key pad assembly that is over molded around a boundary defined by and/or common to a top cover and a bottom cover, wherein the top cover and the bottom cover encapsulate a plurality of key pad components packed together. To this end, independent claim 1 (and similarly independent claims 11, 16, and 22) recites ***a top cover placed over a stack of keypad components; and a bottom cover placed under the stack; the top cover and the bottom cover over molded around the stack to form a self contained key pad unit.*** Kela *et al.* does not teach or suggest such claimed aspects.

Kela *et al.* relates to an electronic device incorporating an electronic display, a keypad, and sources of light for illuminating the display and the keypad. In particular, the cited document provides a mobile telephone in which the key pad membrane may be integrally formed with the key pad (*See* col. 4, lines 8 and 9; col. 3 line 63; col. 4 line 9; figure 5). Kela *et al.* discloses *only two* elements, the membrane and the key pad, which may be integral, as compared to applicants' present invention, which discloses *three* elements, the top cover, the component stack, and the bottom cover. Further, the cited document fails to disclose or suggest molding of any kind, in any context. Applicants' invention teaches a ***top and bottom cover over molded around the stack.*** Additionally, the document does not teach or suggest the key pad as a self-contained unit, as does applicants' invention. Molding the keypad into a stand-alone unit according to applicants' invention creates a protective seal against outside contaminants and mitigates damage thereto, and serves as a sub-assembly, which facilitates assembly into a final unit. In contrast, Kela *et al.* does not disclose encapsulating any components. Figures 3-5 of Kela *et al.* show key pad elements which do not form any type of sub-assembly. Accordingly, withdrawal of this rejection of independent claims 1, 11, 16, and 22, and associated dependent claims, is respectfully requested.

III. Rejection of Claim 9 Under 35 U.S.C. §103(a)

Claim 9 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Kela *et al.* as applied to claim 1 above, and further in view of Collett *et al.* (US 5,517,683). Withdrawal of the rejection is requested for at least the following reason. Claim 9 depends from independent claim 1, and Collett *et al.* does not remedy the aforementioned deficiencies with respect to Kela *et al.* Collett *et al.* relates to an electronics extension system for a portable compact cellular telephone

system. However, the aspects of applicants' claimed invention such as a top cover, a stack of key pad components, and a bottom cover molded together to form a stand alone key pad unit are not disclosed. Thus, this rejection should be withdrawn.

IV. Rejection of Claim 19 Under 35 U.S.C. §103(a)

Claim 19 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Kela *et al.* as applied to claim 18 above, and further in view of Arneson *et al.* (US 6,785,395). Withdrawal of the rejection is requested for at least the following reason. Claim 19 depends from claim 18 as applied to independent claim 11, and Arneson *et al.* does not disclose each and every aspect of the present invention which Kela *et al.* fails to mention. Arneson *et al.* relates to speakers for portable electronic devices. However, the aspects of applicants' claimed invention such as a top cover, a stack of key pad components, and a bottom cover molded together to form a stand alone key pad unit are not disclosed. Accordingly, this rejection should be withdrawn.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [SYMBP192US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

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